

tment of Fish and Wildlife

Department of Forests, Parks and Recreation Department of Environmental Conservation

## State of Vermont

## AGENCY OF NATURAL RESOURCES

DEPARTMENT OF FISH AND WILDLIFE 103 South Main Street, 10 South Waterbury, Vermont 05671-0501

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Wayne Laroche, Commissioner

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December 21, 2005

Michael Johanns, Secretary of Agriculture US Department of Agriculture Farm Bill 1400 Independence Avenue, S.W. Washington, DC 20250-3355

Re: Development of USDA 2007 Farm Bill

Dear Secretary Johanns:

The Vermont Fish and Wildlife Department has reviewed the Federal Register Notice of Vol, 70, No. 116 of June 17, 2005, regarding proposed development of the 2007 Farm Bill. The Department has a cooperative working agreement with the USDA Natural Resources Conservation Service in Vermont in the delivery of technical services related to fish and wildlife under selected existing Farm Bill programs. The Department provides the following comments related to the development of the 2007 Farm Bill:

- 1) The Department suggests the Farm Bill recognize state fish and wildlife agencies as full natural resource partners because they have statutory authority to manage fish and wildlife resources. All states should be able to enter into technical assistance agreements to deliver technical assistance for conservation programs with FSA and NRCS. Barriers should be removed that inhibit state fish and wildlife agencies from entering into these agreements (e.g., eliminate or reduce required match under such agreements).
- 2) Wildlife and fish are public resources, managed by public agencies to provide a multitude of beneficial values for the public, including ecological, aesthetic, scientific, and recreational benefits. The Department believes that wildlife should be co-equal with soil and water in all phases of the Farm Bill throughout implementation, maintenance, monitoring, and evaluation. Fisheries and aquatic resources, in particular, need better integration in all conservation programs.

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1400 Independence Avenue, S.W
Washington, OC 20150-3055

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3) Agricultural and forestry programs impact fish and wildlife resources which are publicly held and thus need prudent measures and close coordination with state and federal fish and wildlife agencies. Some of these impacts may be direct mortality and/or degradation of habitat. The Department supports integration of forest resource needs with fish and wildlife habitat conservation programs and practices in the Farm Bill. The Department also recommends a better integration of fish and wildlife conservation in forest resource management programs and practices. The Department supports consistent and increased funding to FLEP and suggests a requirement that wildlife biologists jointly sign-off on forest stewardship plans.

Many farmers and forest landowners in Vermont are concerned about, and sensitive to, their potential impacts to fish and wildlife and are interested and willing to implement practices and set-aside areas to benefit fish and wildlife. Most of Vermont is forested and-privately owned. Economic conditions here are such that these landowners need financial assistance and incentives to manage for these fish and wildlife resources. Therefore the Department supports increases to WHIP, WRP, EQIP and other programs where wildlife management will benefit interested landowners.

- 4) Ensure that all conservation needs, not only soil and water, are adequately being addressed in all easement programs under the Farm Bill. This would include streams, rivers, wildlife, forests, and other elements that might not historically be the focus of such easements.
- 5) A significant planning effort has recently been undertaken by state fish and wildlife agencies related to federal funding under the State Wildlife Grants Program. States and territories have recently developed Comprehensive Wildlife Conservation Strategies. These documents are a valuable resource and should be utilized and referred to in prioritizing and directing program dollars under various Farm Bill Programs at the state level. Nationally, conservation program priorities should be linked to State Comprehensive Wildlife Conservation Strategies as well.
- 6) The Department believes an important element of enhancing rural and economic growth can be directly related to conservation of fish, wildlife and their habitats. A recent survey documented that in Vermont, over 67 % of Vermonters participate in hunting, fishing or watching wildlife. This participation rate was second only to Alaska nationally. Vermonters and visitors to the state spend more than \$386 million dollars on these fish and wildlife related activities. These expenditures are spread throughout the entire state including our remote and rural regions.

For these public benefits to be realized, fish and wildlife habitat and their populations need to be secured through conservation efforts. As a basic principle, these activities demand that habitat not be developed or transformed into other non-compatible land uses. In other surveys the Department has conducted, over 95% of Vermonters indicated that it was important or very important that fish and wildlife populations are healthy and over 97% said that habitats and lands were important to them.

Even though many landowners are interested in and willing to manage wildlife, economic realities and limitations may prohibit such efforts. The Department believes that strong financial incentives for landowners under the WHIP, EQIP, FLEP, WRP and Forest Legacy Program should be strengthened in the 2007 Farm Bill. A very important element of funding of these programs is the regional equity of conservation program dollars. The Department insists that regional equity be maintained in future farm bills.

7) The Department does not support any additional efforts or incentives to diversify farming practices in any manner that privatize the ownership of wildlife. Such incentives are contrary to the fundamental aspects of managing wildlife in North America where these species are held in public trust.

Thank you for the opportunity to provide input on this very meaningful piece of federal legislation. The Department feels very fortunate to have very capable staff at NRCS and FSA in Vermont. We look forward to local collaborations to maintain and enhance this important conservation program and to advance fish and wildlife management in our state.

Sincerely yours,

Wayne A. Laroche Commissioner

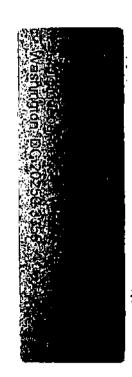
cc: Judy Doerner, NRCS State Conservationist
Jonathan Wood, Commissioner, Forests, Parks, and Recreation
Ron Regan, Director of Wildlife
Eric Palmer, Director of Fisheries

OFFICE OF THE EXECUTIVE SECRETARIAT, USDA

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Agency of Natural Resources
Fish and Wildlife Department
103 South Main Street, 10 South
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Waterbury, VT 05671-0501

Table 1. Cook, peregrine falcons, spiny softshell turtles, ospreys and bald eagles are among the species that will benefit from your gift.

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